

STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0090127-014-AV

APPLICANT

The applicant for this project is Vectorworks Marine, LLC. The applicant's responsible official and mailing address are: Kurtis A. Hopf, Senior Vice President of Operations Vectorworks Marine, LLC, 805 Marina Road, Titusville, Florida, 32796.

FACILITY DESCRIPTION

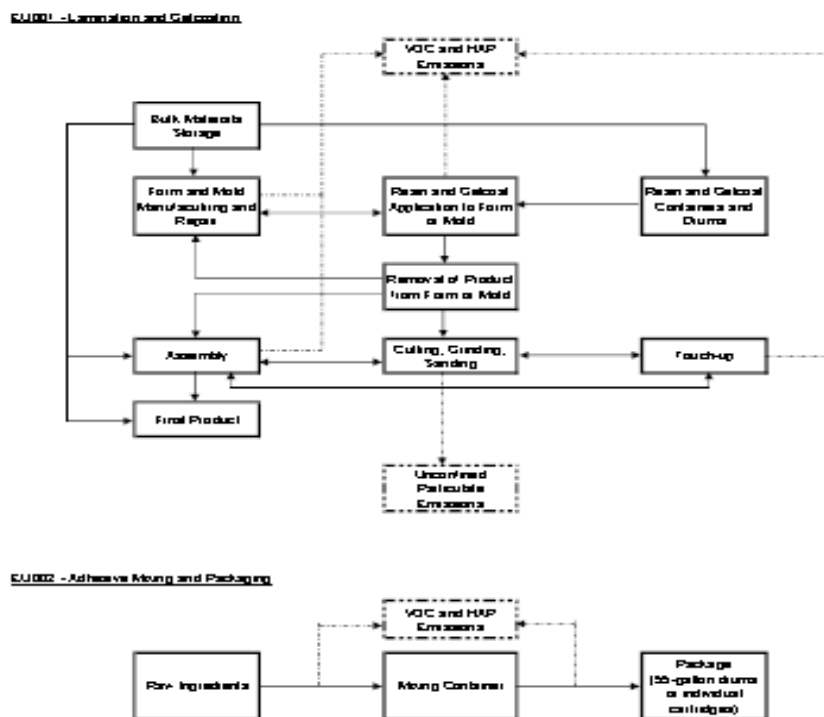
The applicant operates the existing Vectorworks Marine, Titusville facility, which is located in Brevard County at 805 Marina Road, Titusville, Florida.

This existing facility manufactures computer numerical control plugs and molds used for boat manufacturing and other plastic components, fiberglass boats which vary in size and purpose, and non-boat-manufacturing related reinforced plastic composites. The facility consists of four main buildings designated by the facility as follows: an office building, a machining and office building, an infusion molding and large lamination building; and, a lamination and assembly building.

The two emissions units at the facility include the following: Lamination/Gelcoating and Related Activities (EU 001) and Adhesive Mixing/Packaging and Related Activities (EU 002). The facility manufacturing operations are subject to 40 CFR 63 Subpart VVVV, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing, and to 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastics Composites Production. The facility is subject to a facility-wide emission limit of less than 50 tons per year of individual hazardous air pollutants (HAP), total HAPs, and volatile organic compound (VOC) emissions. Compliance with the limits and NESHAP provisions are demonstrated through material use records and emissions calculations as specified in the Specific Conditions of the permit.

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

A process flow diagram depicting facility operations as provided in Renewal Application 0090127-014-AV, is below



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Vectorworks Marine, LLC, 805 Marina Road, Titusville, Florida

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Lamination/Gelcoating Operations and Related Activities
002	Adhesive Mixing/Packaging and Related Activities

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on March 11, 2020, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart VVVV, Boat Manufacturing	001
40 CFR 63, Subpart WWWW, Reinforced Plastic Composites Production	001
<i>State Rule Citations</i>	
Rule 62-4 Florida Administrative Code (F.A.C.) (Permitting Requirements)	All

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Regulation	EU No(s).
Rule 62-204, F.A.C. (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference)	All
Rule 62-210, F.A.C. (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms)	
Rule 62-213, F.A.C. (Title V Air Operation Permits for Major Sources of Air Pollution)	
Rule 62-296, F.A.C. (General Pollutant Emission Limiting Standards)	
Rule 62-297, F.A.C. (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures)	

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Title V Air Operation Permit Renewal 0090127-013-AV issued **November 30, 2015**

Application for a Title V Air Operation Permit Renewal received **March 11, 2020**

Draft-Proposed permit 0090127-014-AV issued **TBD, 2020**

Public Notice published **TBD, 2020**

[1- Title V Renewal Application for Vectorworks Marine, LLC received March 11, 2020](#)

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3732 – Boat Building and Repair (Primary), 3089 – Plastic Products, NEC.

North American Industry Classification System (NAICS): 336612 – Boat Building (Primary), 326199 – All Other Plastics Product Manufacturing.

HAP: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

PROJECT REVIEW

Brief description of any changes that were made as part of this renewal include the following

- 1 Administrative. Updated Cover Page to reflect new DEP logo
- 2 Administrative. The Title V permit was updated to the latest Title V permit format.
- 3 Administrative. Revised Section I Subsection A Facility Description.
- 4 Administrative: Permit Section III A, Emissions Unit 001 was revised to include Applicable Conditions from 40 CFR Subpart VVVV and 40 CFR Subpart WWWW

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- 5 Administrative. The Title V permit appendices were updated to the latest Title V permit formats
- 6 Administrative. Updated Appendix I – List of Insignificant Emissions Units and Activities
- 7 Administrative. Appendix Table H. was revised to reflect current permit project.

CONCLUSION

This project renews Title V air operation permit No. 0090127-013-AV, which was effective on November 30, 2015. This initial Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.